
Daniel Thomas Romero Alma3737 trucking LLC
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FILED US District Court-UT
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

DANIEL THOMAS ROMERO, Alma3737
trucking LLC

Plaintiff,

vs.

TMD TRANSPORTATION INC., TMD
LOGISTICS INC., and AMAZON.COM,
INC.,

Defendant(s).

Case: 2:25-cv-00396
Assigned To : Bennett, Jared C.
Assign. Date : 5/19/2025
Description: Romero v. TMD
Transportation et al

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

DANIEL THOMAS ROMERO, Alma3737 trucking LLC

Plaintiff,

v.

TMD TRANSPORTATION INC., TMD LOGISTICS INC., and AMAZON.COM, INC.,

Defendants.

motion
COMPLAINT

(Civil Action for Breach of Contract, Fraud, and Emotional Distress)

Civil No:

Judge:

INTRODUCTION

1. Plaintiff Daniel Thomas Romero, a Utah resident, brings this action against TMD Transportation Inc., TMD Logistics Inc., and Amazon.com, Inc., for breach of contract, fraud, and intentional infliction of emotional distress resulting from Defendants' refusal to pay for contracted trucking services and their engagement in fraudulent business practices affecting at least 50 other carriers.
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JURISDICTION AND VENUE

2. This Court has jurisdiction under 28 U.S.C. § 1332(a) because the parties are citizens of different states and the amount in controversy exceeds \$75,000.
 3. Venue is proper in the District of Utah under 28 U.S.C. § 1391(b) because Plaintiff resides in this district and suffered harm here.
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PARTIES

4. Plaintiff Daniel Thomas Romero is a citizen and resident of Utah.
 5. Defendant TMD Transportation Inc. is a transportation company operating across state lines, believed to be headquartered outside of Utah.
 6. Defendant TMD Logistics Inc. is a freight broker affiliated with TMD Transportation, also located outside of Utah.
 7. Defendant Amazon.com, Inc. is a multinational corporation incorporated in Delaware with its principal place of business in Washington.
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FACTUAL ALLEGATIONS

In or around [insert 03/16/2023, Plaintiff entered into an agreement with TMD Logistics Inc., acting as broker for a load from Amazon's Kent, Washington facility to Trenton, new jersey.

8. Plaintiff attempted to verify the legitimacy of the shipment by contacting Amazon, but Amazon representatives failed to assist and hung up.
9. Despite concerns, Plaintiff relied on the broker's representations, retrieved a second driver in Salt Lake City, and completed the delivery as agreed.

10. Plaintiff was promised \$9,000 for the load, but was instead sent a fraudulent wire transfer confirmation, and payment was never made.
 11. Plaintiff later learned that TMD had defrauded approximately 50 other carriers in a similar way.
 12. As a direct result of this fraud and nonpayment, Plaintiff's business collapsed, leading to almost homelessness, job loss, and multiple psychiatric hospitalizations over the past 18 months.
 13. Plaintiff suffered financial ruin and continues to experience severe emotional and mental distress due to Defendants' actions.
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CLAIMS FOR RELIEF

Count I – Breach of Contract (Against TMD Transportation and TMD Logistics)

15. Defendants entered into a binding agreement with Plaintiff for transportation services.
16. Plaintiff fully performed under the contract.
17. Defendants breached the contract by failing to pay the agreed-upon amount.
18. Plaintiff suffered financial losses and business collapse as a result.

Count II – Fraud (Against All Defendants)

19. Defendants knowingly misrepresented the legitimacy of the load and payment.
20. Plaintiff reasonably relied on these false representations to his detriment.
21. Defendants issued a fake wire transfer, a clear act of fraud.
22. Plaintiff and many other carriers were defrauded by the same scheme.

Count III – Intentional Infliction of Emotional Distress (Against All Defendants)

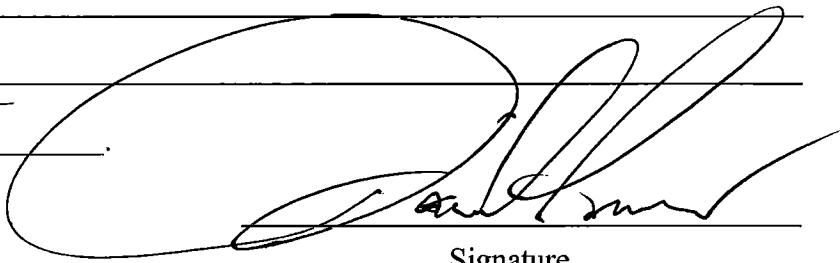
23. Defendants' conduct was extreme, intentional, and outrageous.
24. Defendants knew their actions would cause serious harm.
25. Plaintiff suffered repeated mental health crises, hospitalizations, and emotional breakdowns.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Award compensatory damages in excess of \$20,000,000;
 - B. Award lost income and business damages;
 - C. Award general and special damages for emotional distress;
 - D. Award punitive damages in the amount of \$20,000,000;
 - E. Award costs, interest, and other relief as deemed just and proper.
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DATED: 5/19/2025



Signature

CERTIFICATE OF SERVICE

I certify that on _____ a copy of the above motion was served, by first class U.S. mail, fax, email, or hand-delivery, to
at

(Opposing party or counsel)

(Address)

Dated: _____

Signature